

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

WILLIAM FRANCIS, JR. )  
                          )  
Plaintiff,            )  
                          )  
v.                     )           C.A. No. 07-015-JJF  
                          )  
                          )  
WARDEN THOMAS CARROLL,            )  
CORRECTIONAL MEDICAL SERVICES    )  
STAN TAYLOR, and JOYCE TALLEY,    )           TRIAL BY JURY OF  
                          )  
                          )  
Defendants.            )

**PLAINTIFF'S FIRST SET OF INTERROGATORIES DIRECTED TO  
DEFENDANT CORRECTIONAL MEDICAL SERVICES, INC.**

**TO:** CORRECTIONAL MEDICAL SERVICES, INC.

Pursuant to Federal Rule of Civil Procedure (FRCP) 33, Plaintiff hereby requests that you answer under oath the following Interrogatories within thirty (30) days. You are requested to set out each Interrogatory prior to the answer directed to it. If there is insufficient space to answer any Interrogatory, the remainder of the answer shall follow on supplemental sheets.

The Plaintiff in the above-entitled action, pursuant to Rule 33 of the FRCP, requests that the following interrogatories be answered under oath by Defendant CMS, Inc.'s designee or representative, stating the full name and title of each person answering Plaintiff's interrogatories.

These Interrogatories shall be deemed continuing so as to require supplemental Answers between the time answered and the time of trial.

Pursuant to Fed. R. Civ. P. 34, all documents requested to be produced are to be attached to the Answers to Interrogatories. In the event that the requested documents cannot be attached to the Answers to Interrogatories, you are to provide the direct mail contact information of the agency and official to which Plaintiff may direct a request to view, inspect and copy the documents in question, and the reason why such documents could not be attached to the Answers to Interrogatories.

**INTERROGATORIES**

1. What are the required treatment options for chronic periodontitis proscribed by the American Dental Association (ADA), the American Academy of Periodontology (AAP), the National Institutes of Health (NIH) and the National Institute of Dental and Craniofacial Research (NIDCR)?

**ANSWER:**

2. State, define and/or explain in detail each treatment option – surgical and non-surgical – listed in the previous interrogatory.

**ANSWER:**

3. Which of the stated treatment options are provided to inmate-patients diagnosed with chronic periodontitis at the Delaware Correctional Center (DCC)?

**ANSWER:**

4. Do dental implants help with the effects of periodontal disease?

**ANSWER:**

5. Is extraction the final treatment option offered to inmate-patients with chronic periodontal disease at the DCC?

**ANSWER:**

6. What are the known health risks associated with chronic periodontal disease?

**ANSWER:**

7. Can periodontal disease cause and/or contribute to health problems beyond the mouth such as hypertension/high blood pressure, stroke, heart disease, diabetes and oral cancer?

**ANSWER:**

8. Have you contracted a periodontist to provide treatment to inmate-patients at the DCC?

**ANSWER:**

9. Do you consider chronic periodontitis or periodontal disease to be a serious medical condition?

**ANSWER:**

10. Dentists and dental hygienists at the Delaware Correctional Center (DCC) have repeatedly told Plaintiff that they cannot provide any treatment beyond routine teeth cleaning and dental extraction. Why has Plaintiff not been referred to a periodontist for treatment?

**ANSWER:**

11. When will Plaintiff be referred to a periodontist for treatment for his chronic periodontal disease?

**ANSWER:**

By: William Francis, Jr., pro se  
William Francis, Jr., pro se  
Delaware Correctional Center  
SBI# 264560  
1181 Paddock Road  
Smyrna, DE 19977

DATED: April 25, 2008

Certificate of Service

I, William Francis, Jr., hereby certify that I have served a true

And correct cop(ies) of the attached: Plaintiff's First Set of

Interrogatories Directed to Defendant CMS, Inc. upon the following  
parties/person (s):

TO: Megan T. Mantzavinos  
913 Market Street, #800  
Wilmington, DE 19801

TO: Ophelia M. Waters  
Deputy Attorney General  
820 N. French Street, 6<sup>th</sup> Fl.  
Wilmington, DE 19801

TO: \_\_\_\_\_  
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TO: \_\_\_\_\_  
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BY PLACING SAME IN A SEALED ENVELOPE, and depositing same in the United  
States Mail at the Delaware Correctional Center, Smyrna, DE 19977.

On this 25<sup>th</sup> day of April, 2008

William Francis, Jr.